

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LOUISIANA WHOLESALE DRUG CO., INC., et al.	:	Civil Action No. 07 CIV 7343 (HB)
	:	
	:	
v.	:	Hon. Harold Baer, U.S.D.J.
	:	ECF Case
	:	
SANOFI-AVENTIS, et al.	:	
	:	

NOTICE OF PLAINTIFF’S MOTION FOR CLASS CERTIFICATION

PLEASE TAKE NOTICE that, upon the Class Action Complaint herein, and upon the January 29, 2008 Declaration of Jeffrey J. Leitzinger, Ph.D., and upon Plaintiff’s Memorandum of Law in Support of Class Certification submitted herewith, plaintiff Louisiana Wholesale Drug Co., Inc. (“LWD”) hereby moves this Court, at the United States District Courthouse, 500 Pearl Street, New York, New York, before the Honorable Harold Baer, for an Order pursuant to Rule 23 of the Federal Rules of Civil Procedure, substantially in the form proposed herewith, (1) certifying that this action shall proceed as a class action, (2) certifying that LWD shall serve as the representative of the Class, (3) determining the definition of the Class, the class claims, issues, and defenses, and (4) appointing Class counsel.

LWD identifies the class for which certification is sought as follows:

All persons or entities in the United States who purchased 10 mg or 20 mg Arava tablets directly from Aventis (or any of its predecessors or affiliates) at any time from March 2005 until the present. Excluded from the Class are Defendants, their predecessors, officers, directors, management, employees, subsidiaries, parents or affiliates, and all federal governmental entities.

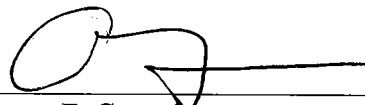
Regarding notice, plaintiff proposes that, because defendants’ sales records provide each Class member’s name and address, Class members can be identified with minimal effort, and

individually notified thorough first class mail, which satisfies the applicable notice requirements. Counsel for the Class may retain a claims administrator to facilitate the dissemination of the notice. The claims administrator will review defendants' sales records and independently verify each class member's address, format the notice into an easily readable form, mail the notice to class members and monitor the number of opt-outs and returns that are received.

WHEREFORE, plaintiff respectfully requests that this action be certified as a class action under Fed. R. Civ. P. 23(b)(3) on behalf of the Class, that plaintiff Louisiana Wholesale Co., Inc. be appointed to represent the Class, and that the Court appoint counsel to the Class.

Dated: January 31, 2008

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Anne K. Fornecker, do hereby certify that on January 31, 2008, I served the foregoing NOTICE OF PLAINTIFF'S MOTION FOR CLASS CERTIFICATION on the following attorneys, in the manner specified below:

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